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5 Attorney for Plaintiff  
6 NEVADA TITLE COMPANY

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 NEVADA TITLE COMPANY, a Nevada  
corporation,

10 Plaintiff,

11 vs.

12 ACE AMERICAN INSURANCE COMPANY, a  
13 Pennsylvania corporation,

14 Defendant.

15 \_\_\_\_\_/  
and counterclaim.

Case No. 2:18-cv-1823-GMN-(VCF)

THE PARTIES' STIPULATION and  
(PROPOSED) ORDER TO RESET THE  
COURT'S HEARING ON DEFENDANT'S  
MOTION, NOW SET FOR JUNE 13, 2019  
(First Request)

16  
17 Plaintiff and Counter-defendant, NEVADA TITLE COMPANY, ("NTC") by its counsel,  
18 Steven J. Parsons, of LAW OFFICES OF STEVEN J. PARSONS, and Defendant and Counter-claimant,  
19 ACE AMERICAN INSURANCE COMPANY, ("ACE American") by its counsel, Michael W.  
20 Melendez, of COZEN O'CONNOR, hereby stipulate to seek the Court's resetting of Defendant's  
21 Motion to Modify Scheduling Order to Phase Discovery and Schedule Dispositive Motions on  
22 Claims Relating to NTC's Prior Knowledge (ECF No. 37) from Thursday, June 13, 2019 (set  
23 by this Court's Order on June 5, 2019, ECF No. 49) to a later date, for the reasons outlined  
24 herein.

25 This Stipulation between the parties to reset this Hearing is the first request; Plaintiff's  
26 counsel had planned to accompany his spouse in driving to southern California on the morning  
27 of Thursday, June 13, 2019 for professional work and other appointments on Friday, June 14,

1 2019 – including with Counsel’s longtime Ophthalmologist to review recent changes in  
2 Counsel’s vision; and, to attend the graduation of their son from the University of California –  
3 Riverside and to celebrate Father’s Day in California on the same day, Sunday, June 16,  
4 2019. This request by Plaintiff’s counsel, and the gracious concession by Defendant’s counsel  
5 to not oppose this Request, is upon good cause and is not simply for the purposes of delay.

6 The parties’ counsel have met and conferred and are available to attend a reset hearing  
7 on:

8 Friday, June 21, 2019;

9 Friday, June 28, 2019;

10 Monday, July 1, 2019; and

11 Wednesday, July 3, 2019.

12 Dated: Friday, June 7, 2019

13 LAW OFFICES OF STEVEN J. PARSONS

COZEN O’CONNOR

14 /s/ Steven J. Parsons  
15 STEVEN J. PARSONS  
16 Nevada Bar No. 363

/s/ Michael W. Melendez  
MICHAEL W. MELENDEZ  
Nevada Bar No. 6741

16 Attorney for Plaintiff and Counter-defendant  
17 NEVADA TITLE COMPANY

Attorney for Defendant and Counter-claimant  
ACE AMERICAN INSURANCE COMPANY

18 ORDER

19 IT IS SO ORDERED.

20 Upon the foregoing Stipulation of the parties, the Hearing on Defendant’s Motion,  
21 presently set for Thursday, June 13, 2019 shall now be at 2:30 PM, 6-21-2019, in Ctrm  
22 \_\_\_\_\_, o’clock, on 3D\_\_\_\_\_.

23 Dated: June 7, 2019.

24   
25 U.S. MAGISTRATE JUDGE